

# EXHIBIT “16”

File No.: 1075-1792

**Dvorak & Associates, LLC**

467 Middlesex Avenue

Metuchen, New Jersey 08840

(732) 317-0130 (732) 317-0140 (FAX)

Attorneys for Defendants, Woodbridge Detective Brian Jaremczak, Detective Shayne Bodnar, Detective Patrick Harris, Detective Nicole Hubner, Patrolman Jeann Rastegarpanah, Detective Juan Carlos Bonilla, Jr.

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

---

**MARY MOE whose initials are K.O., JANE DOE, whose initials are I.P., a minor by her Guardian ad Litem K.O. and K.O., Individually**

Civil Action No.: 2:19-cv-14139

**Plaintiff,**

**v.**

**TOWNSHIP OF WOODBRIDGE, its agents, servants and/or employees, DETECTIVE JUAN CARLOS BONILLA, JR., in his official and individual capacity, DETECTIVE BRIAN JAREMCZAK, in his official and individual capacity, DETECTIVE SHAYNE BODNAR, in his official and individual capacity, DETECTIVE PATRICK HARRIS, in his official and individual capacity, DETECTIVE NICOLE HUBNER, in her official and individual capacity, PATROLMAN JEIAN RASTEGARPANAH, in his official and individual capacity, CHIEF LAW ENFORCEMENT OFFICER CAPTAIN ROY HOPPOCK in his official supervisory and individual capacity, DEPUTY POLICE DIRECTOR JOSEPH NISKY, in his official supervisory and individual capacity, POLICE DIRECTOR ROBERT HUBNER, in his official supervisory and individual capacity, CITY OF SOUTH AMBOY, its agents servants and/or employees, PATROLMAN ROBERT BESNER, in his official and individual capacity, SARGEANT RICHARD WOJACZYK, in his official and individual capacity, POLICE CHIEF DARREN LAVIGNE, in his official supervisory and individual capacity, STATE OF JERSEY, its agents, servants and/or employees, KEISHA RIDLY, in her official and individual capacity, JACQUELINE CARDONA, in her official supervisory and individual capacity, CARMEN DIAZ-PETTI, in her official supervisory and individual capacity, CHRISTINE NORBUT BEYER, M.S.W., in her official supervisory and individual capacity, ABC CORP. 1-10, POLICE OFFICER JOHN DOE 1-20, in his/her official and individual capacities, SUPERIOR POLICE OFFICER ROB ROE 1-10, in his/her official supervisory and individual capacity, DEF CORP 1-10, GHI CORP. 1-10, BOB DOE 1-10 in his/her official and individual capacities, SUPERVISOR PAULA POE 1-10 in his/her official supervisory and individual capacity (the last seven being fictitious designations)**

Civil Action

**CERTIFICATION OF  
DETECTIVE JUAN BONILLA JR.**

I, **DETECTIVE JUAN BONILLA, JR.** being of full age, do hereby certify as follows:

1. I am employed as Detective with the Woodbridge Police Department and have been since 2008. As such, I have personal knowledge of the within.
2. On or about December 2016 I was advised it was the Policy of Woodbridge Police Department, via directive of Middlesex County Prosecutor's Office that all complaints were to be screened through the Middlesex County Prosecutors Office by a zone prosecutor.
3. On June 21, 2018, to the best of my recollection I acted in accordance with this policy.
4. I do not have any recollection of during the time period where the screening policy was in place of skipping or ignoring review of a complaint by a zone prosecutor.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: \_\_\_\_\_, 2023

\_\_\_\_\_  
Detective Juan Bonilla, Jr.

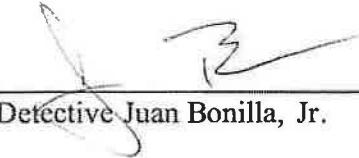
I hereby certify that the affiant acknowledges the genuineness of the above signature of Detective Juan Bonilla, Jr.

Dated: December 14, 2023

/s/ Grace E. Lempka  
**GRACE E. LEMPKA, ESQ.**  
**Dvorak & Associates, LLC**  
*Attorneys for Defendants, Woodbridge*  
*Detective Brian Jaremczak, Detective Shayne Bodnar,*  
*Detective Patrick Harris, Detective Nicole Hubner,*  
*Patrolman Jeiann Rastegarpanah, Detective Juan*  
*Carlos Bonilla, Jr.*

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: DECEMBER 14<sup>th</sup>, 2023



\_\_\_\_\_  
Detective Juan Bonilla, Jr.

I hereby certify that the affiant acknowledges the genuineness of the above signature of Detective Juan Bonilla, Jr.

Dated: December 14, 2023

/s/ Grace E. Lempka  
**GRACE E. LEMPKA, ESQ.**  
**Dvorak & Associates, LLC**  
*Attorneys for Defendants, Woodbridge*  
*Detective Brian Jaremczak, Detective Shayne Bodnar,*  
*Detective Patrick Harris, Detective Nicole Hubner,*  
*Patrolman Jeiann Rastegarpanah, Detective Juan*  
*Carlos Bonilla, Jr.*